

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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G & G CLOSED CIRCUIT EVENTS, LLC,

Case No.: 21-cv-07351-DLC

Plaintiff,

- against -

DECLARATION OF PLAINTIFF'S  
COUNSEL IN SUPPORT OF  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT

ASHLEIGH BERTOLINI, et al.,

Defendants.

-----X

I, ROBERT B. HUNTER, declare as follows:

1. I am counsel for G & G Closed Circuit Events, LLC in this case. I am duly licensed to practice law in the State of New York, and in this Court.
2. I have personal knowledge of each and every fact stated herein and could competently testify thereto if called as a witness.
3. I make this Declaration in Support of Plaintiff's Opposition to Defendants Ashleigh Bertolini, individually and d/b/a PARQ, and GLO 718 Corp., an unknown business entity d/b/a PARQ (hereinafter "Defendants") Motion for Summary Judgment.
4. Attached hereto as Exhibit 1 is a true and correct copy of the Affidavit of James M. Emery, Jr. sworn to the 15<sup>th</sup> day of May, 2019 (hereinafter the 'Emery' Piracy Aff').
- 4a. Attached hereto as Exhibit 2 is the affidavit of the auditor Gary Joseph sworn to the 9<sup>th</sup> day of May 2019. This affidavit concerns Mr. Joseph's visit to the Defendants' business establishment located at 4001 Tremont Avenue, Bronx NY 10456 on May 4, 2019.
5. Attached hereto as Exhibits 3 and 4, respectively, are true and correct copies of Defendants' Response to Plaintiff's First Requests for Admission dated February 9, 2022, and Defendants' Amended Response to Plaintiff's Request for Admissions dated April 22, 2022.

6. Attached hereto as Exhibit 5 is a true and correct copy of a New York State Corporate Records Search result for GLO 718 Corp., obtained from the New York Department of State website. Plaintiff requests that the Court take judicial notice of this information as it was obtained from an official New York government website and it is “capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2); *see Volpe v. Am. Language Commc'n Ctr., Inc.*, 200 F. Supp. 3d 428, 431, n.1 (S.D.N.Y. 2016), *aff'd*, 692 F. App'x 51 (2d Cir. 2017) (“Courts routinely take judicial notice of documents retrieved from official government websites.”); *Wells Fargo Bank, N.A. v. Wrights Mill Holdings, LLC*, 127 F. Supp. 3d 156, 166 (S.D.N.Y. 2015) (“As to the seven documents retrieved from official government websites . . . it is clearly proper to take judicial notice. Courts routinely take judicial notice of such governmental records.”)

7. Attached hereto as Exhibit 6 is a true and correct copy of a New York State Liquor Authority Public License with respect to GLO 718 Corp. This Court may take judicial notice of this information for the reasons set forth in paragraph 6, *supra*.

8. Attached hereto as Exhibit 7 is a true and correct copy of a May 3, 2019 Facebook post from Parq Sports Bar and Grill. The Court may consider this information as a non-hearsay party admission. *See* Fed. R. Evid. 801(d)(2)(A).

I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of December 2022 at Monticello, New York.

By: S/ Robert B. Hunter  
Robert B Hunter

# **EXHIBIT 1**

STATE OF New York

COUNTY OF Bronx

**AFFIDAVIT**

I hereby declare under penalty of perjury and in conformance with the provisions set forth in Title 28 U.S.C. § 1746 that

I, James M Emery Jr, being duly sworn according to law deposes and says, that on May 4th \_\_\_\_\_, 2019 at \_\_\_\_\_

(date)

11:53 p.m./a.m, I entered the PARO \_\_\_\_\_  
(time) (trade name of establishment)

located at 4001 East Tremont Avenue, Bronx NY 10465

(street address, city, state, zip code)

I paid a cover charge of \$ 20.00 to enter this establishment. I ordered 1 Drink(s) from the

Bartender/ Barmaid/ Waitress who was described as light skinned female hispanic wearing a black dress and heels, hair pulled back

2 door men both African American, one tall and one was a little person, both wearing jeans and a dark tshirs. The 20 cover charge got you 2 free drinks excluding Hennessey and patron

(name, sex, age, ethnicity, distinguishing characteristics)

I observed 11 televisions located inside this establishment. The televisions can be  
(total # of TVs)

described as follows: various sizes approx. 40" located \_\_\_\_\_

(make, model, and size of each TV)

Tv's were located on each wall of the establishment

(specific location of each TV)

At the time I was inside all but 1 tv was showing a different fight, only 1 tv in the back had the DAZN fight. Canelo Alvarez was warming up in the ring with green gloves, vigorously flexing his jaw.,\_\_\_\_\_

(names of fighters or commentators, trunk colors of each fighter/attire of commentators, time remaining in round)

I also observed the following distinguishing items inside the establishment: aquarium like bubbling water features located throughout the bar

(posters, decorations, pool tables, memorabilia, etc.)

This establishment rates good  
(Good, Fair, Poor)

Page 1 of 2

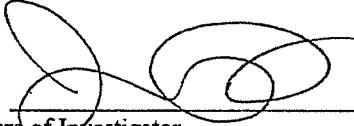
The capacity of this establishment is approximately 150 people. At the time of my appearance I counted the number of patrons three (3) separate times. The head counts were 60,  
60, 63.

I left the above establishment at 11:56p.m./a.m on may 4<sup>th</sup> 2019,  
(time) (date)

I also observed the following license plates in the parking lot

1) NY REG HXH5969 2) NY REG T774932C 3) NY REG HSU 4865  
4) NY REG GWB 9323 5) \_\_\_\_\_ 6) \_\_\_\_\_

Date: May 15<sup>th</sup> 2019

  
Signature of Investigator

James M Emery Jr.  
Name of Investigator (Printed)

Briecke Inc.  
Investigative Agency

845-726-4136  
Telephone Number of Agency

**NOTARY**

State of: New York  
County of: CHAMPAIGN

On before me, Susan Jacks, personally appeared James Emery, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

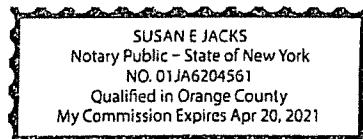
I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

(SEAL)

Signature Susan Jacks

Page 2 of 2



# **EXHIBIT 2**

STATE OF NEW YORK

COUNTY OF BRONX

AFFIDAVIT

I, the undersigned, being duly sworn according to law deposes and says, that on MAY 4, 2019 at  
(date)

9:00 PM. I entered the PARQ  
(time) (trade name of establishment)

located at 4001 E TREMONT AVE, THE BRONX, NY 10465  
(street address, city, state, zip code)

I paid a cover charge of \$ZERO to enter this establishment. I ordered NOTHING Drink(s) from the

WAITRESS who was described as FEMALE, HISPANIC, 30-35 YEARS OLD, 5'5', 130 LBS, LONG DARK HAIR IN A PONYTAIL, BLACK LONG SLEEVE SHIRT, BLACK PANTS.  
(name, sex, age, ethnicity, distinguishing characteristics)

I observed EIGHT televisions located inside this establishment. The televisions can be  
(total # of TVs)

described as follows: 46" & 65" SAMSUNG TV'S  
(make, model, and size of each TV)

located BEHIND BAR & BACK ROOM AREA  
(specific location of each TV)

At the time I was inside the above establishment, I observed the following program on the above televisions:  
DAZN EVENT: LAMONT ROACH JR (BLACK/RED/GOLD TRUNKS) VS JONATHAN OQUENDO (BLACK/WHITE TRUNKS), WITH 2:10 LEFT OF THE 2<sup>ND</sup> ROUND.  
(names of fighters or commentators, trunk colors of each fighter/attire of commentators, time remaining in round)

I also observed the following distinguishing items inside the establishment: LARGE "L" SHAPED BAR LEFT OF ENTRANCE, WHITE & RED BOOTHS W/"PARQ" LOGO RIGHT OF ENTRANCE, JUKE BOX ON BRICK WALL, SILVER BOOTHS W/TABLES & CHAIRS IN BACK AREA, RAINBOW LED LIGHTING BEHIND BAR, FRONT & BACK AREA VISIBLE THROUGH BAR, DJ BOOTH, "THE WORLD IS YOURS" SIGN ABOVE DJ BOOTH, LED RAINBOW GLASS W/BUBBLES ON BACK WALL  
(posters, decorations, pool tables, memorabilia, etc.)

This establishment rates: GOOD  
(Good, Fair, Poor)

The capacity of this establishment is approximately 80 people. At the time of my appearance I counted the number of patrons three (3) separate times. The head counts were 20,  
20, 20.

I left the above establishment at 9:20 PM  
(time) on 5/4/19  
(date)

I also observed the following license plates in the parking lot: N/A

- 1) \_\_\_\_\_ 2) \_\_\_\_\_ 3) \_\_\_\_\_  
4) \_\_\_\_\_ 5) \_\_\_\_\_ 6) \_\_\_\_\_

Date: 5/9/2019

  
\_\_\_\_\_  
Signature of Investigator

GARY JOSEPH  
Name of Investigator (Printed)

OMNI PRESENT INVESTIGATIONS  
Investigative Agency

516-369-1920  
Telephone Number of Agency

NOTARY

State of: New York  
County of: Nassau

On May 9, 2019, before me, Elizabeth Mogilner, Notary Public personally appeared Gary Joseph,  personally known to me ---or---[ ] proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she executed the same in his/her authorized capacity, and that by his/her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

  
\_\_\_\_\_  
ELIZABETH MOGILNER  
Notary Public, State of New York  
Reg. No. 01MO6382795  
Qualified in Nassau County  
Commission Expires 11/05/2022

Signature of Notary

# **EXHIBIT 3**

Robert B. Hunter  
Law Offices of M.L. Zager, P.C.  
461 Broadway, PO Box 948  
Monticello NY 12701  
[rhunter@mzager.com](mailto:rhunter@mzager.com)  
Fax: 845-794-3919  
Tel: 845-794-3660

Attorneys for Plaintiff  
G & G Closed Circuit Events LLC

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

G & G Closed Circuit Events LLC

Case No.: 1:21-cv-07351-VSB

Plaintiff,

vs.

Ashleigh Bertolini, et al

Defendants.

**PLAINTIFF'S FIRST REQUEST  
FOR ADMISSIONS**

**PROPOUNDING PARTY:** G & G Closed Circuit Events LLC

**RESPONDING PARTY:** Ashleigh Bertolini individually and d/b/a PARQ and GLO 718 Corp.  
an unknown business Entity d/b/a PARQ

**SET NUMBER:** ONE

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff G & G Closed Circuit Events LLC requests that the Defendant makes the following admissions within thirty (30) days after service of their request for the purpose of the action only, and subject to all pertinent objections to admissibility which may be interposed at the trial.

## **DEFINITIONS**

1. The term "YOU" and "YOUR" refers to yourself personally, and if applicable, shall also include any and all officers, agents, attorneys, employees and/or representatives of yourself individually and the business you operate, known or doing business as GLO 718 Corp. an unknown business entity d/b/a PARQ located at 4001 E Tremont Avenue Bronx NY 10465.
2. The term "ESTABLISHMENT" refers to the business known as GLO 718 Corp. an unknown business entity d/b/a PARQ located at 4001 E Tremont Avenue Bronx NY 10465.
3. The term "EVENT" refers to the Saul Alvarez v Daniel Jacobs, WBA/WBC/IBF World Middleweight Championship Fight Program, of Saturday, May 4, 2019 , as referenced in Plaintiff's Complaint.

## **REQUEST FOR ADMISSIONS**

### **REQUEST FOR ADMISSION #1:**

YOU did not order the EVENT for the ESTABLISHMENT from G & G Closed Circuit Events LLC.

### **REQUEST FOR ADMISSION #2:**

No one else ordered the EVENT for the ESTABLISHMENT from G & G Closed Circuit Events LLC, on your behalf.

### **REQUEST FOR ADMISSION #3:**

YOU did not pay a licensing fee for the EVENT to G & G Closed Circuit Events LLC.

### **REQUEST FOR ADMISSION #4:**

No one else paid a licensing fee for the EVENT for the ESTABLISHMENT to G & G Closed Circuit Events LLC, on your behalf.

**REQUEST FOR ADMISSION #5:**

YOU did not order the EVENT for the ESTABLISHMENT from any other authorized party acting on behalf of G & G Closed Circuit Events LLC.

**REQUEST FOR ADMISSION #6:**

No one else ordered the EVENT for the ESTABLISHMENT from any other authorized party acting on behalf of G & G Closed Circuit Events LLC, on your behalf.

**REQUEST FOR ADMISSION #7:**

YOU ordered the EVENT from DirecTv.

**REQUEST FOR ADMISSION #8:**

YOU ordered the EVENT from Dish Network.

**REQUEST FOR ADMISSION #9:**

YOU ordered the EVENT from YOUR local cable company.

**REQUEST FOR ADMISSION #10:**

In advance of the EVENT, YOU advertised that the EVENT would be telecast at the ESTABLISHMENT.

**REQUEST FOR ADMISSION #11:**

In advance of the EVENT, some other person, acting on your behalf, advertised that the EVENT would be telecast at the ESTABLISHMENT.

**REQUEST FOR ADMISSION #12:**

Acting on YOUR behalf, YOUR employees advertised that the EVENT would be telecast within the ESTABLISHMENT.

**REQUEST FOR ADMISSION #13:**

The EVENT was shown in the ESTABLISHMENT on Saturday, May 4, 2019 .

**REQUEST FOR ADMISSION #14:**

YOU were personally aware that a commercial sub-licensing fee had to be paid to G & G Closed Circuit Events LLC in order to lawfully telecast the EVENT in the ESTABLISHMENT.

**REQUEST FOR ADMISSION #15:**

YOU paid commercial sub-licensing fees to G & G Closed Circuit Events LLC, previously.

**REQUEST FOR ADMISSION #16:**

YOU paid commercial sub-licensing fees to other companies, previously.

**REQUEST FOR ADMISSION #17:**

Patrons of the ESTABLISHMENT watched the EVENT within the ESTABLISHMENT on Saturday, May 4, 2019 .

**REQUEST FOR ADMISSION #18:**

On Saturday, May 4, 2019 , the ESTABLISHMENT required its patrons to pay a cover charge (or some other type of entrance fee) to enter the ESTABLISHMENT's premises while the EVENT was broadcast.

**REQUEST FOR ADMISSION #19:**

Prior to Saturday, May 4, 2019 , the ESTABLISHMENT exhibited other pay-per-view broadcasts.

**REQUEST FOR ADMISSION #20:**

On Saturday, May 4, 2019 , the ESTABLISHMENT had a television programming account with DirecTv, Dish Network or YOUR local cable company.

**REQUEST FOR ADMISSION #21:**

The EVENT exhibited at the ESTABLISHMENT was obtained after YOU paid DirecTv, Dish Network or YOUR local cable company a residential rate sublicensing fee.

**REQUEST FOR ADMISSION #22:**

The EVENT was received in the ESTABLISHMENT because an illegal decoder box was used in the ESTABLISHMENT.

**REQUEST FOR ADMISSION #23:**

The EVENT was received in the ESTABLISHMENT because satellite service television programming services the ESTABLISHMENT.

**REQUEST FOR ADMISSION #24:**

The EVENT was received in the ESTABLISHMENT because YOU moved a satellite receiver box into the ESTABLISHMENT.

**REQUEST FOR ADMISSION #25:**

The EVENT was received in the ESTABLISHMENT because YOU employed some other means to intercept or receive the EVENT.

**REQUEST FOR ADMISSION #26:**

The EVENT was received at the ESTABLISHMENT because YOU ordered the EVENT from an internet programming provider (i.e. website).

**REQUEST FOR ADMISSION #27:**

YOU are an owner of the ESTABLISHMENT.

**REQUEST FOR ADMISSION #28:**

YOU are the manager of the ESTABLISHMENT.

**REQUEST FOR ADMISSION #29:**

YOU are an officer of the entity owning the ESTABLISHMENT.

**REQUEST FOR ADMISSION #30:**

YOU were inside the ESTABLISHMENT on the night the EVENT was broadcast.

**REQUEST FOR ADMISSION #31:**

YOU were inside the ESTABLISHMENT the day the EVENT was broadcast.

**REQUEST FOR ADMISSION #32:**

The employees at the ESTABLISHMENT act as agents on YOUR behalf.

**REQUEST FOR ADMISSION #33:**

The television monitors within the ESTABLISHMENT exist for the viewing pleasure of the ESTABLISHMENT's patrons.

**REQUEST FOR ADMISSION #34:**

The ESTABLISHMENT exhibits television programming that is believed to be of interest to the ESTABLISHMENT's patrons.

**REQUEST FOR ADMISSION #35:**

The EVENT was broadcast at the ESTABLISHMENT while food was sold to patrons.

**REQUEST FOR ADMISSION #36:**

The EVENT was broadcast at the ESTABLISHMENT while alcoholic beverages were sold to patrons.

**REQUEST FOR ADMISSION #37:**

The EVENT was broadcast at the ESTABLISHMENT while non-alcoholic beverages were sold to patrons.

**REQUEST FOR ADMISSION #38:**

YOU personally informed patrons the EVENT would be exhibited at the ESTABLISHMENT.

**REQUEST FOR ADMISSION #39:**

YOU personally informed employees the EVENT would be exhibited at the

ESTABLISHMENT.

**REQUEST FOR ADMISSION #40:**

YOU acknowledge G & G Closed Circuit Events LLC has been damaged by your actions.

**REQUEST FOR ADMISSION #41:**

YOU were notified of G & G Closed Circuit Events LLC's claims against you before you were sued.

**REQUEST FOR ADMISSION #42:**

YOU knew that the ESTABLISHMENT was not properly authorized to exhibit the EVENT.

**REQUEST FOR ADMISSION #43:**

YOU knew that the ESTABLISHMENT did not obtain a commercial license to exhibit the EVENT.

**REQUEST FOR ADMISSION #44:**

YOU knew that commercial establishments were required to have a commercial license to broadcast pay-per-view boxing events.

**REQUEST FOR ADMISSION #45:**

The ESTABLISHMENT has a commercial account with the telephone company.

**REQUEST FOR ADMISSION #46:**

The ESTABLISHMENT has a commercial account with the electric company.

**REQUEST FOR ADMISSION #47:**

The ESTABLISHMENT has a commercial account with the gas company.

**REQUEST FOR ADMISSION #48:**

The ESTABLISHMENT has a commercial account with the water company.

**REQUEST FOR ADMISSION #49:**

The ESTABLISHMENT has a commercial account with the garbage or refuse company.

**REQUEST FOR ADMISSION #50:**

The ESTABLISHMENT is party to a commercial lease presently in effect.

**REQUEST FOR ADMISSION #51:**

The ESTABLISHMENT was party to a commercial lease as of Saturday, May 4, 2019

Dated: October 21, 2021



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M.L. ZAGER, P.C.  
BY: Robert B. Hunter  
*Attorney for Plaintiff*  
P.O. Box 948, 461 Broadway  
Monticello, N.Y. 12701  
(845) 794-3660

**AFFIRMATION OF SERVICE BY MAIL**

The undersigned affirms under penalty of perjury that he is over 18 years of age and is an attorney at law duly admitted to practice in the State of New York and is associated with the firm of M.L. Zager, P.C.

That on the 21 day of OCTOBER, 2021, affirmant served the within **PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS** upon Robert Howard Rickner of Rickner PLLC, 14 Wall Street, Suite 1603, New York, NY 10005 & upon Shana Fried of The Fried Firm at 231 Front St. Ste 206 Brooklyn, NY 11201 the address designated by them for the purpose by depositing a true copy of the same enclosed in a postpaid properly addressed wrapper by regular mail in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.

Dated: October 21, 2021



M.L. ZAGER, P.C.  
BY: Robert B. Hunter  
*Attorney for Plaintiff*  
P.O. Box 948, 461 Broadway  
Monticello, N.Y. 12701  
(845) 794-3660

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

G & G Closed Circuit Events LLC,

Plaintiff,  
vs.

**DEFENDANTS' RESPONSE  
TO PLAINTIFF'S FIRST  
REQUEST FOR ADMISSIONS**

Ashleigh Bertolini, individually, and  
GLO 718 Corp. d/b/a PARQ;

Case No.: 1:21-cv-07351-VSB

Defendants.

-----X

**PROPOUNDING PARTY:** G&G Closed Circuit Events LLC

**RESPONDING PARTY:** Ashleigh Bertolini individually and GLO 718 Corp. d/b/a PARQ

**SET NUMBER:** ONE

**DEFINITIONS**

1. The term "Defendants" refers to Ashleigh Bertolini, individually, and/or GLO 718 Corp. d/b/a PARQ.
2. The term "ESTABLISHMENT" refers to the business known as GLO 718 Corp. an unknown business entity d/b/a PARQ located at 4001 E Tremont Avenue Bronx NY 10465.
3. The term "EVENT" refers to the Saul Alvarez v Daniel Jacobs, WBA/WBC/IBF World Middleweight Championship Fight Program, of Saturday, May 4, 2019, as referenced in Plaintiffs Complaint.

**RESPONSE TO PLAINTIFF'S REQUEST FOR ADMISSIONS**

RESPONDING PARTY HEREBY ANSWERS THE PROPOUNDING PARTY'S REQUEST FOR ADMISSION:

**REQUEST FOR ADMISSION NO. 1**

Admit that Defendants did not order the EVENT for the ESTABLISHMENT from G & G Closed Circuit Events LLC.

**REQUEST FOR ADMISSION NO. 2**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 2 at this time.

**REQUEST FOR ADMISSION NO. 3**

Admit that Defendants did not pay a licensing fee for the EVENT to G & G Closed Circuit Events LLC.

**REQUEST FOR ADMISSION NO. 4**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 4 at this time.

**REQUEST FOR ADMISSION NO. 5**

Admit that Defendants did not order the EVENT for the ESTABLISHMENT from any other authorized party acting on behalf of G & G Closed Circuit Events LLC.

**REQUEST FOR ADMISSION NO. 6**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 6 at this time.

**REQUEST FOR ADMISSION NO. 7**

Defendants specifically deny Request for Admission No. 7 in its entirety.

**REQUEST FOR ADMISSION NO. 8**

Defendants specifically deny Request for Admission No. 8 in its entirety.

**REQUEST FOR ADMISSION NO. 9**

Defendants specifically deny Request for Admission No. 9 in its entirety.

**REQUEST FOR ADMISSION NO. 10**

Defendants specifically deny Request for Admission No. 10 in its entirety.

**REQUEST FOR ADMISSION NO. 11**

Defendants deny Request for Admission No. 11 as there was no advertisement that said the EVENT would be telecast.

**REQUEST FOR ADMISSION NO. 12**

Defendants deny Request for Admission No. 12 as there was no advertisement that said the EVENT would be telecast.

**REQUEST FOR ADMISSION NO. 13**

Admit that the Event was shown in the ESTABLISHMENT on Saturday, May 4, 2019.

**REQUEST FOR ADMISSION NO. 14**

Defendants specifically deny Request for Admission No. 14 in its entirety.

**REQUEST FOR ADMISSION NO. 15**

Admit that Defendants paid commercial sub-licensing fees to G & G Closed Circuit Events LLC, previously.

**REQUEST FOR ADMISSION NO. 16**

Defendants object to Request for Admission No. 16 as vague and ambiguous. Subject to the foregoing objection, Defendants specifically deny Request for Admission No. 16 in its entirety.

**REQUEST FOR ADMISSION NO. 17**

Admit that Patrons of the ESTABLISHMENT watched the EVENT within the ESTABLISHMENT on Saturday, May 4, 2019.

**REQUEST FOR ADMISSION NO. 18**

Admit that on Saturday, May 4, 2019, the ESTABLISHMENT required its patrons to pay a cover charge (or some other type of entrance fee) to enter the ESTABLISHMENT's premises while the EVENT was broadcast.

**REQUEST FOR ADMISSION NO. 19**

Admit that prior to Saturday, May 4, 2019, the ESTABLISHMENT exhibited other pay-per-view broadcasts.

**REQUEST FOR ADMISSION NO. 20**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 20 at this time.

**REQUEST FOR ADMISSION NO. 21**

Defendants specifically deny Request for Admission No. 21 in its entirety.

**REQUEST FOR ADMISSION NO. 22**

Defendants specifically deny Request for Admission No. 22 in its entirety.

**REQUEST FOR ADMISSION NO. 23**

Defendants specifically deny Request for Admission No. 23 in its entirety.

**REQUEST FOR ADMISSION NO. 24**

Defendants specifically deny Request for Admission No. 24 in its entirety.

**REQUEST FOR ADMISSION NO. 25**

Defendants specifically deny Request for Admission No. 25 in its entirety.

**REQUEST FOR ADMISSION NO. 26**

Defendants specifically deny Request for Admission No. 26 in its entirety.

**REQUEST FOR ADMISSION NO. 27**

Admit that Defendants are an owner of the ESTABLISHMENT.

**REQUEST FOR ADMISSION NO. 28**

Defendants object to Request for Admission No. 28 as vague and ambiguous. Subject to the foregoing objection, Defendants specifically deny Request for Admission No. 28 in its entirety.

**REQUEST FOR ADMISSION NO. 29**

Admit that Defendants are an officer of the entity owning the ESTABLISHMENT.

**REQUEST FOR ADMISSION NO. 30**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 30 at this time.

**REQUEST FOR ADMISSION NO. 31**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 31 at this time.

**REQUEST FOR ADMISSION NO. 32**

Defendants specifically deny Request for Admission No. 32 in its entirety.

**REQUEST FOR ADMISSION NO. 33**

Defendants object to Request for Admission No. 33 as vague and ambiguous. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 33 in its entirety.

**REQUEST FOR ADMISSION NO. 34**

Defendants object to Request for Admission No. 34 as vague and ambiguous. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 34 in its entirety.

**REQUEST FOR ADMISSION NO. 35**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 35 at this time.

**REQUEST FOR ADMISSION NO. 36**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 36 at this time.

**REQUEST FOR ADMISSION NO. 37**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 37 at this time.

**REQUEST FOR ADMISSION NO. 38**

Defendants specifically deny Request for Admission No. 38 in its entirety.

**REQUEST FOR ADMISSION NO. 39**

Defendants specifically deny Request for Admission No. 39 in its entirety.

**REQUEST FOR ADMISSION NO. 40**

Defendants specifically deny Request for Admission No. 40 in its entirety.

**REQUEST FOR ADMISSION NO. 41**

Defendants have made a reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny Request for Admission No. 41 at this time.

**REQUEST FOR ADMISSION NO. 42**

Defendants object to Request for Admission No. 42 as assuming the admission of facts which have been previously denied or which have not been established. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 42 in its entirety.

**REQUEST FOR ADMISSION NO. 43**

Defendants object to Request for Admission No. 43 as assuming the admission of facts which have been previously denied or which have not been established. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 43 in its entirety.

**REQUEST FOR ADMISSION NO. 44**

Defendants object to Request for Admission No. 44 as assuming the admission of facts which have been previously denied or which have not been established. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 44 in its entirety.

**REQUEST FOR ADMISSION NO. 45**

Defendants object to Request for Admission No. 45 as vague and ambiguous. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 45 in its entirety

**REQUEST FOR ADMISSION NO. 46**

Defendants object to Request for Admission No. 46 as vague and ambiguous. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 46 in its entirety

**REQUEST FOR ADMISSION NO. 47**

Defendants object to Request for Admission No. 47 as vague and ambiguous. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 47 in its entirety

**REQUEST FOR ADMISSION NO. 48**

Defendants object to Request for Admission No. 48 as vague and ambiguous. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 48 in its entirety

**REQUEST FOR ADMISSION NO. 49**

Defendants object to Request for Admission No. 49 as vague and ambiguous. Subject to the foregoing objections, Defendants specifically deny Request for Admission No. 49 in its entirety

**REQUEST FOR ADMISSION NO. 50**

Admit that the ESTABLISHMENT is party to a commercial lease presently in effect.

**REQUEST FOR ADMISSION NO. 51**

Admit that the ESTABLISHMENT was party to a commercial lease as of Saturday, May 4, 2019.

Dated: February 9, 2022

Respectfully submitted,

/s/ Shana Fried

Shana Fried  
The Fried Firm PLLC  
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# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
G & G Closed Circuit Events LLC,

Plaintiff,

vs.

Ashleigh Bertolini, individually, and  
GLO 718 Corp. d/b/a PARQ;

Defendants.

**DEFENDANTS' AMENDED  
RESPONSE TO PLAINTIFF'S  
FIRST REQUEST FOR  
ADMISSIONS**

Case No.: 1:21-cv-07351-VSB

-----X

**PROPOUNDING PARTY:** G&G Closed Circuit Events LLC

**RESPONDING PARTY:** Ashleigh Bertolini individually and GLO 718 Corp. d/b/a PARQ

**SET NUMBER:** ONE

**DEFINITIONS**

1. The term "Defendants" refers to Ashleigh Bertolini, individually, and/or GLO 718 Corp. d/b/a PARQ.
2. The term "ESTABLISHMENT" refers to the business known as GLO 718 Corp. an unknown business entity d/b/a PARQ located at 4001 E Tremont Avenue Bronx NY 10465.
3. The term "EVENT" refers to the Saul Alvarez v Daniel Jacobs, WBA/WBC/IBF World Middleweight Championship Fight Program, of Saturday, May 4, 2019, as referenced in Plaintiffs Complaint.

**AMENDED RESPONSE TO PLAINTIFF'S REQUEST FOR ADMISSIONS**

RESPONDING PARTY HEREBY ANSWERS THE PROPOUNDING PARTY'S REQUEST FOR ADMISSION:

**REQUEST FOR ADMISSION NO. 6**

Deny.

**REQUEST FOR ADMISSION NO. 20**

Defendants admit that on Saturday, May 4, 2019, the ESTABLISHMENT has a DirectTv account, and deny the remainder of the Request for Admission.

**REQUEST FOR ADMISSION NO. 33**

Admit.

**REQUEST FOR ADMISSION NO. 34**

Admit.

**REQUEST FOR ADMISSION NO. 36**

Admit.

Dated: April 22, 2022

Respectfully submitted,

/s/ Shana Fried

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# **EXHIBIT 5**

# Department of State

## Division of Corporations

### Entity Information

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#### Entity Details

**ENTITY NAME:** GLO 718 CORP.

**DOS ID:** 5258722

**FOREIGN LEGAL NAME:**

**FICTITIOUS NAME:**

**ENTITY TYPE:** DOMESTIC BUSINESS CORPORATION

**DURATION DATE/LATEST DATE OF DISSOLUTION:**

**SECTION OF LAW:** 402 BCL - BUSINESS CORPORATION LAW

**ENTITY STATUS:** ACTIVE

**DATE OF INITIAL DOS FILING:** 01/02/2018

**REASON FOR STATUS:**

**EFFECTIVE DATE INITIAL FILING:** 01/02/2018

**INACTIVE DATE:**

**FOREIGN FORMATION DATE:**

**STATEMENT STATUS:** PAST DUE DATE

**COUNTY:** BRONX

**NEXT STATEMENT DUE DATE:** 01/31/2020

**JURISDICTION:** NEW YORK, UNITED STATES

**NFP CATEGORY:**

ENTITY DISPLAY      [SEARCH](#)    [PRINT](#)    [EXCEL](#)    [PDF](#)    [CSV](#)    [HTML](#)    [XML](#)    [RSS](#)

#### Service of Process Name and Address

**Name:** THE CORPORATION

**Address:** 4005 E. TREMONT AVE., BRONX, NY, UNITED STATES, 10465

#### Chief Executive Officer's Name and Address

**Name:**

**Address:**

#### Principal Executive Office Address

**Address:**

#### Registered Agent Name and Address

**Name:**

**Address:**

#### Entity Primary Location Name and Address

**Name:**

**Address:**

#### Farmcorpflag

**Is The Entity A Farm Corporation:** NO

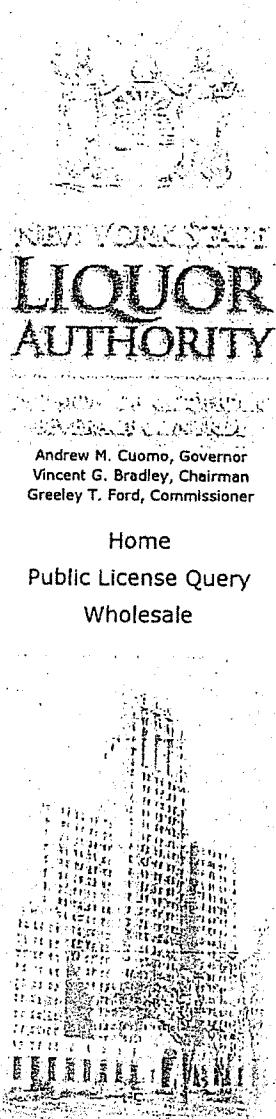
Stock Information

Share Value	Number Of Shares	Value Per Share
NO PAR VALUE	200	\$0.00

# **EXHIBIT 6**

5/9/2019

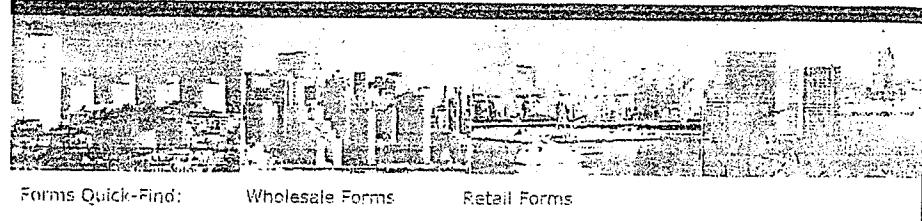
New York State Liquor Authority



NEW YORK STATE  
**LIQUOR**  
AUTHORITY

Andrew M. Cuomo, Governor  
 Vincent G. Bradley, Chairman  
 Greeley T. Ford, Commissioner

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[Help](#)**Public Query - Results****License Information**

Serial Number: 1309967  
 License Type: ON-PREMISES LIQUOR  
 License Status: License Is Active  
 Credit Group: 3  
 Filing Date: 07/31/1800  
 Effective Date: 10/05/2018  
 Expiration Date: 09/30/2020

**Premises Information**

Principal's Name: BERTOLINI, ASHLEIGH  
 Premises Name: GLO 718 CORP  
 Trade Name: PARQ  
 Zone: 1  
 Address: 4001 E TREMONT AVE

BRONX, NY 10465  
 County: BRONX

---

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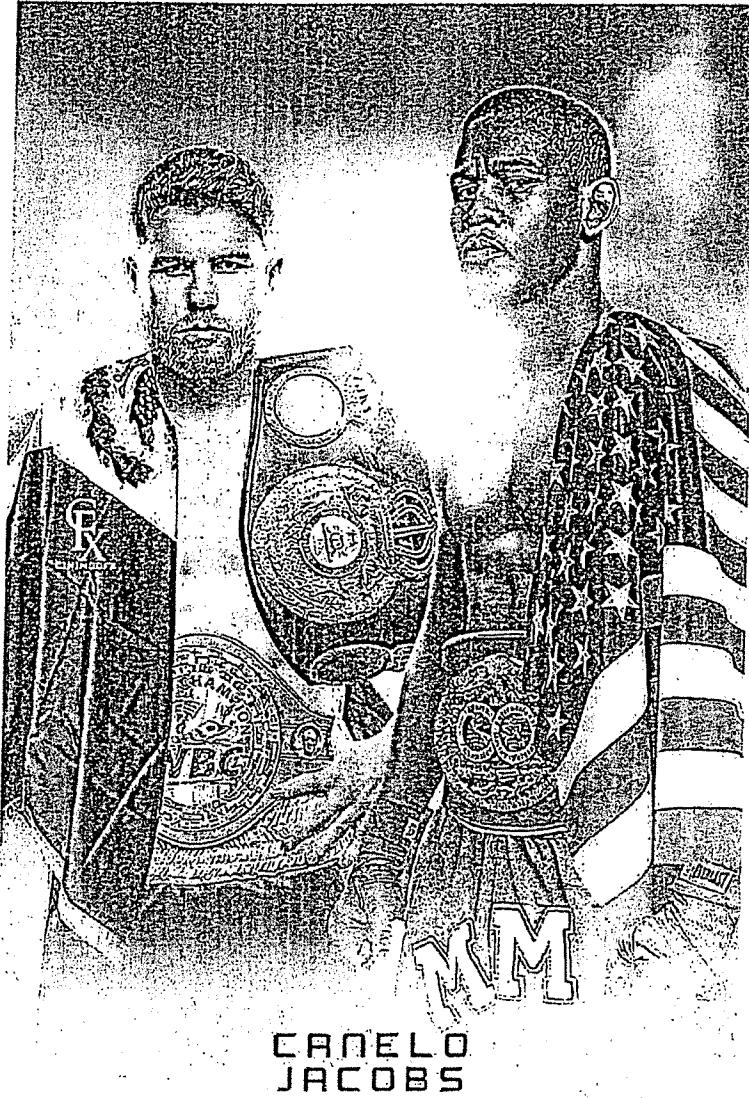
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 New York State Liquor Authority • 80 S. Swan Street • 9th Floor • Albany, New York • 12210-8002

# **EXHIBIT 7**

7/8/2019

Parq Sports Bar and Grill - Home



Parq Sports Bar and Grill

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#canelojacobs tomorrow! You don't wanna miss this one! \$20 for guys \$0 for ladies. Kitchen open till 2am. Drink specials all night. \$20 buckets \$5 mixed drinks. \$4 draft beers. #partyatparq #ParqBX #throggsneck #hookah #Bxsportsbar #lounge #interactivebar #smokingdrinks #drinkspecials #bottlespecials #goodvibesonly #yourfavoritebartenders

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